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AO 91 (Rev. 11/11) Criminal Complaint

Agent:

Brett Laug

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Ludvin Santiago PEREZ-RAMIREZ,

Case No. 25-mj-30096

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 25, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

8 U.S.C. 1326(a)

Unlawful ReEntry Following Removal From the United States

This criminal complaint is based on these facts:

On or about February 25, 2025, in the Eastern District of Michigan, Southern Division, Ludvin Santiago PEREZ-RAMIREZ, an alien from Guatemala, was found in the United States after having been denied admission, excluded, deported, and removed there from on or about August 17, 2018, and not having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

February 27, 2025

Date: _____

City and state: Detroit, MI

*Complainant's signature*Brett Laug, Border Patrol Agent/DHS*Printed name and title*

*Judge's signature*Anthony P. Patti, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Brett A. Laug, declare the following under penalty of perjury:

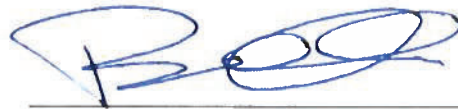
1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and records checks of law enforcement databases. I have also reviewed the immigration file and system automated data relating to Ludvin Santiago PEREZ-RAMIREZ. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant for Ludvin Santiago PEREZ-RAMIREZ, for a violation of 8 U.S.C § 1326 (a), Unlawful Re-Entry following Removal. I have not included every fact known to law enforcement related to this investigation.
2. On February 25, 2025, at approximately 3:45 AM, Border Patrol Agents assigned to the Central Region Anti-Smuggling Unit, conducted a targeted enforcement action at 11XX Mill Street in Lincoln Park, Michigan. Through investigative efforts, agents identified this address as the current residence of Ludvin Santiago PEREZ-RAMIREZ, a known illegal alien who had been previously removed from the United States. Based on surveillance and photographs from previous immigration arrests obtained during the

investigation, agents were able to positively identify PEREZ-RAMIREZ as he was placing a trash receptacle on the road in front of the residence.

3. Agents approached PEREZ-RAMIREZ, identified themselves as Border Patrol Agents, and performed an immigration inspection. PEREZ-RAMIREZ was interviewed in the Spanish language by a Border Patrol Agent. PEREZ-RAMIREZ readily admitted to his identity, and to being a citizen of Guatemala. Agents inquired whether PEREZ-RAMIREZ possessed documents allowing him to be or remain in the United States legally. PEREZ-RAMIREZ stated that he is a citizen of Guatemala and that he did not have any documents permitting him to be or remain in the United States. PEREZ-RAMIREZ said that he has lived in Lincoln Park, MI, since November 2024.
4. Upon determining that PEREZ-RAMIREZ had illegally re-entered the United States, agents placed PEREZ-RAMIREZ under arrest and transported him to the Gibraltar Border Patrol Station for processing.
5. While at the Gibraltar Border Patrol Station, PEREZ-RAMIREZ's fingerprints and photograph were captured and entered into the Automated Biometric Identification System (IDENT) and the Next Generation Identification (NGI). The results revealed that PEREZ-RAMIREZ is a citizen of Guatemala with no record of re-entering the United States legally.

6. A review of PEREZ-RAMIREZ's immigration history indicates that on August 12, 2018, PEREZ-RAMIREZ was arrested by the United States Border Patrol in Hidalgo, Texas. At that time PEREZ-RAMIREZ claimed that he had entered the United States by crossing the Rio Grande River on a raft. PEREZ-RAMIREZ was given an Order of Expedited Removal. On August 17, 2018, PEREZ-RAMIREZ was removed from the United States.
7. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226 and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
8. Review of the Alien File (A# XXX XXX 388) for Ludvin Santiago PEREZ-RAMIREZ and queries in U.S. Department of Homeland Security databases confirm no record exists of PEREZ-RAMIREZ obtaining permission from the Attorney General or Secretary of the Department of Homeland Security to re-apply for admission to the United States after his removal from the United States on August 17, 2018.

9. Based on the above information, I believe there is probable cause to conclude that Ludvin Santiago PEREZ-RAMIREZ is a native and citizen of Guatemala, who was previously removed from the United States and was thereafter found in the United States, without the express permission from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to re-apply for admission into the United States in violation of Title 8 United States Code, Section 1326(a).



Brett A. Laug, Border Patrol Agent
U.S. Department of Homeland Security

Subscribed and sworn to before me and
signed in my presence and/or by reliable
electronic means.



Honorable Anthony P. Patti
United States Magistrate Judge

February 27, 2025